

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
IP-Enabled Services)	WC Docket No. 04-36
)	
E911 Requirements for IP-Enabled Service Providers)	WC Docket No. 05-196
)	

**REPLY COMMENTS OF SBC COMMUNICATIONS INC.
IN RESPONSE TO NENA / VON COALITION JOINT PETITION FOR CLARIFICATION**

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I. INTRODUCTION AND SUMMARY

SBC Communications Inc. (SBC) respectfully submits the following reply comments in response to the joint petition for clarification filed by the National Emergency Number Association (NENA) and the Voice on the Net (VON) Coalition¹ regarding the Commission's *VoIP 911 Order*.² While the petition raises a variety of issues, SBC focuses these reply comments on one issue in particular: a request by NENA and the VON Coalition asking the Commission to permit access to 911 selective routers via the Public Switched Telephone Network (PSTN) using routable but non-dialable telephone numbers (RND access). In light of the concerns that NENA *itself* has recently voiced about the vulnerabilities and technical difficulties associated with RND access, SBC urges the Commission not to accept RND access as a valid method for complying with the Commission's VoIP 911 rules. Instead, the Commission should continue to encourage cooperative industry efforts to develop reliable 911 solutions for VoIP services.

II. DISCUSSION

In the *VoIP 911 Order*, the Commission required all interconnected VoIP 911 calls to be routed "through the dedicated Wireline E911 Network."³ The Commission observed that compliance with this obligation would require interconnected VoIP providers to obtain trunking to the various selective routers that are part of that dedicated Wireline E911 Network, either

¹ Joint Petition for Clarification of the National Emergency Number Association and the Voice on the Net (VON) Coalition, WC Docket Nos. 04-36, 05-196 (July 29, 2005) (NENA / VON Coalition Petition).

² *E911 Requirements for IP-Enabled Service Providers*, WC Docket No. 05-196, First Report and Order and Notice of Proposed Rulemaking, FCC 05-116 (released June 3, 2005) (*VoIP 911 Order*).

³ *VoIP 911 Order* ¶ 40.

directly from an ILEC, or through a CLEC or other provider that has itself obtained such trunking.⁴

In their petition, NENA and the VON Coalition expressed concern that direct trunking to selective routers “may not be able to be installed” before the November 28, 2005 compliance deadline established by the *VoIP 911 Order*.⁵ As an alternative to direct trunking, NENA and the VON Coalition asked the Commission to permit interconnected VoIP providers to rely on RND access to send 911 calls to selective routers, which in turn would route the call to the appropriate Public Safety Answering Point (PSAP).⁶ RND access allows traffic to be routed to the selective router as a standard telephone call over the PSTN using a routable but non-dialable telephone number assigned to the selective router, effectively allowing the interconnected VoIP provider to “call” the selective router.⁷ Once the call reaches the selective router, it is then delivered to the appropriate PSAP over dedicated 911 infrastructure.⁸ Because the RND access method “in some cases may be implemented more quickly than a solution that requires direct trunking to the [selective router,]” NENA and the VON Coalition ask the Commission to clarify

⁴ *VoIP 911 Order* ¶ 40.

⁵ NENA / VON Coalition Petition at 6. Notwithstanding NENA and the VON Coalition’s generalized concerns about the timely provisioning of trunking to selective routers, SBC has publicly stated that it stands ready to provision the necessary trunking in sufficient time to meet the Commission’s November 28, 2005 deadline, provided that we receive timely service orders from parties seeking such trunking. *See* SBC Comments, WC Docket No. 05-196, at 4 (Aug. 15, 2005).

⁶ NENA / VON Coalition Petition at 6-8.

⁷ A routable, non-dialable telephone number cannot be accessed simply by direct dialing the number, thus preventing a POTS user from accessing the selective router. As discussed below, however, NENA has acknowledged that the RND access method may, in fact, need to rely on dialable numbers.

⁸ NENA / VON Coalition Petition at 6-7.

that, as an interim solution, RND access is an acceptable method for handling VoIP 911 calls under the Commission rules.⁹

Although NENA endorsed the RND access method in its joint petition with the VON Coalition, NENA *itself* has subsequently reversed course and raised substantial concerns with RND access. In its reply comments on the notice of proposed rulemaking section of the *VoIP 911 Order*, NENA told the Commission that it had “asked a special work group to study RND [access] and come up with a recommendation.”¹⁰ According to NENA, the results of the study “were not positive for the ultimate goal of high-quality, reliable access to E9-1-1.”¹¹ NENA further characterized RND access as “undesirable,” “vulnerable to 9-1-1 call blockage,” and “in some ways technically unworkable.”¹²

In addition, NENA posted the RND access working group’s complete report on its website.¹³ That report chronicles a host of serious concerns with RND access, including:

- The need to use *dialable* numbers to route calls across multiple carrier networks on the PSTN, which “poses a risk of misdialed calls being routed to a PSAP and appearing as an emergency call.”
- The inability to provide congestion management, which “can result in [the] inability to complete 9-1-1 calls to PSAPs.”
- The potential for “deliberate denial of service attacks by users or organizations intentionally trying to disrupt the E9-1-1 system.”
- The use of non-dedicated facilities to transport calls to selective routers, which means that those facilities cannot be effectively “tagged, monitored, and protected” to ensure rapid restoration in the event of an outage. This inability to tag, monitor, and protect

⁹ NENA / VON Coalition Petition at 7-8.

¹⁰ NENA Reply Comments, WC Docket No. 05-196, at 4 (Sept. 12, 2005).

¹¹ NENA Reply Comments at 4-5.

¹² NENA Reply Comments at 5.

¹³ See http://www.nena.org/VoIP_IP/PSTN%20Risks%20&%20Challenges%20FINAL.doc

also may result in trunks being “removed from service for maintenance purposes without following normal E9-1-1 service protection procedures.”

In light of the concerns about RND access that NENA itself has recently expressed, the Commission should not accept RND access as a valid means for complying with the *VoIP 911 Order*. Instead, the Commission should continue to encourage all VoIP 911 stakeholders to work cooperatively to develop robust solutions for the delivery of 911 service in an IP environment.

III. CONCLUSION

For all of the foregoing reasons, the Commission should deny the petition filed by NENA and the VON Coalition to the extent it asks the Commission to find that the RND access method of routing VoIP 911 calls is an acceptable practice under the Commission’s VoIP 911 rules.

Respectfully Submitted,

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